

August 20, 2002

Helen Hatch
Product Regulations Specialist
FMC Corporation
Lithium Division
Box 795 Highway 161
Bessemer City, NC 28016

Dear Ms. Hatch:

The Office of Pollution and Toxics is transmitting EPA's comments on the robust summaries and test plan for Butyllithium posted on the ChemRTK HPV Challenge Program Web site on April 2, 2002. I commend FMC Corporation for its commitment to the HPV Challenge Program.

EPA reviews test plans and robust summaries to determine whether the reported data and test plans will provide the data necessary to adequately characterize each SIDS endpoint. On its Challenge Web site, EPA has provided guidance for determining the adequacy of data and preparing test plans used to prioritize chemicals for further work.

EPA will post this letter and the enclosed Comments on the HPV Challenge Web site within the next few days. If you have any questions about this response, please contact Richard Hefter, Chief of the HPV Chemicals Branch, at 202-564-7649. Submit questions about the HPV Challenge Program through the HPV Challenge Program Web site "Submit Technical Questions" button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached by e-mail at tsca-hotline@epa.gov.

I thank you for your submission and look forward to your continued participation in the HPV Challenge Program.

Sincerely,

-S-

Oscar Hernandez, Director
Risk Assessment Division

Enclosure

cc: W. Sanders
A. Abramson
C. Auer
M. E. Weber

**EPA Comments on Chemical RTK HPV Challenge Submission:
Butyllithium (CAS # 109-72-8)**

SUMMARY OF EPA COMMENTS

The sponsor, FMC Corporation submitted a test plan and robust summaries to EPA on March 8, 2002, for the chemical Butyllithium (CAS # 109-72-8). EPA posted the submission on the ChemRTK HPV Challenge Web site on April 2, 2002.

EPA has reviewed this submission and has reached the following conclusions:

1. Physicochemical Properties, Environmental Fate, Health Effects and Ecological Effects. EPA agrees that it is not possible to conduct any of the SIDS-level tests on this chemical.

EPA COMMENTS ON THE BUTYLLITHIUM CHALLENGE SUBMISSION

Test Plan

Physicochemical Properties, Environmental Fate, Health Effects and Ecological Effects

EPA agrees that, owing to the highly reactive nature of this chemical when in contact with air or water, it is not feasible to perform physicochemical, environmental fate, mammalian or ecotoxicological tests.

Followup Activity

None